

The proposed Broadband Over Power Line (BPL) rules is an ill-conceived idea that will have tremendous detrimental effects on Land-Mobile radio licensees, Federal Government agencies, Amateur Radio Licensees and the General Public at large.

The very nature of transmitting a wide-band RF digital signal (ie: Broadband) via an unshielded power line to consumer's houses is not feasible.

In the Commission's own rules, no television cable companies within the U.S. are allowed to transmit any type (or form) of radio frequency signals on certain frequencies down the alleys or to the consumer's residence via SHIELDED COAX cable. This rule was written to protect any "leakage of signals" on particular frequencies from the cable companies SHIELDED coaxial cable.

History has shown that the Commission considers that violation of this rule to a very serious matter and if caught, the Commission issues Notice Of Violations (with substantial monetary fines) to cable companies that are found to violate this rule.

This rule was written to protect any form of radiation on radio frequencies that are used by aircraft - from the cable companies, whom all of which employ "SHIELDED COAXIAL" cable.

How in the world do the electrical power utilities and the Commission think that the transmission of one or more digital signals via an UN-SHIELDED power line to residences and other electrical consumers will not cause undue interference to the general public's receivers?

What is your residential power line anyway? Simply an UNSHIELDED wire that brings power to your house. If BPL is allowed, that same wire will act as an transmitting antenna.

This is the same type of UNSHIELDED wire that you would string between your house and an outer support that you connect to your AM Broadcast, HF or Shortwave receiver.

With my comments on this matter, I speak with over 40 years experience in the business of the design and construction of HF, VHF, UHF and Microwave radio systems, all of which have receivers. My professional experience includes both commercial and Federal Governmental radio systems.

In addition to my professional experience, I have been licensed by the FCC as a Amateur Radio Licensee for over 35 years, with an Amateur Radio license of Advanced and Extra classes. I currently hold an Extra Class license with the call sign W5AHN.

In recent years, I have noted (along many with other AM broadcast engineers), that there has been a substantial increase in "Power Line Interference" from the electrical utilities' power lines.

It is becoming HARDER and HARDER to receive standard AM Broadcast signals in the 550 to 1700 Khz range, due to the increase in power line generated radio frequency interference.

The increase in RF interference from the electrical power lines is due to the lack of repair of the electrical transmission and distribution lines by the electrical utilities themselves.

With the effects of deregulation, the electrical utilities are not maintaining their company owned electrical lines as well as is needed, due to the "lack of profits" by their companies.

If the Commission would like further demonstration of the above fact, I would be happy to accompany any FCC Washington official or the FCC's Field Operations Bureau around the North Texas area to see firsthand the interference problem that exist today with the electrical power lines. Today, it is virtually impossible to get the local electrical company to repair their company's transmission and distribution lines when they are causing interference.

In addition to being responsible for the design, installation and maintenance of HF radio systems that are used by various Federal Governmental agencies, I also am responsible for fixed VHF and UHF mobile relay or repeater equipment that is used by Amateur Radio operators in the North Texas area.

Furthermore, with the formation of the U.S. Department of Homeland Security, I have firsthand knowledge that the Federal and State Governments are even more dependent on the licensed Amateur Radio operators in the United States, to supply backup communications to law-enforcement and other authorities. This is evident by the support given by the Amateur Radio licensee during the tragic 9-11 events and the recent fires in California.

Last and not least, adequate FCC Rules are in place NOW that allow for the provision of "Broadband" via existing licensed and unlicensed RF transmission, along with telephone and cable company means.

In light of the above reasons alone, the issuance of FCC Rules to allow "Broadband" transmission via BPL is not warranted.

The proposed rulemaking on BPL should be immediately abandoned.